

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
WESTERN DIVISION

---

UNITED STATES OF AMERICA, CR 21-50145

Plaintiff, FACTUAL BASIS STATEMENT

vs.

WILLIAM JACOB STONE,

Defendant.

---

The undersigned defendant stipulates that the following facts are true and the parties agree they establish a factual basis for the plea in the action pursuant to Federal Rules of Criminal Procedure 11(b)(3):

Between March 4, 2020, and June 21, 2021, William Jacob Stone used the Internet to knowingly download visual depictions of minors engaged in sexually explicit conduct (hereinafter “child pornography”). Stone then used Adobe PhotoShop software and his Apple iPad to edit certain of the child pornography images he had downloaded. Specifically, Stone used his iPad and PhotoShop to superimpose naked images of himself into images of child pornography so that the images appeared to depict himself sexually abusing the children. Stone’s conduct was brought to the attention of law enforcement through a Cybertip sent by Adobe to the National Center for Missing and Exploited Children. Forensic analysis of Stone’s devices revealed over 600 images and 5 videos depicting child pornography.

When interviewed by law enforcement agents, Stone admitted using websites on the internet to knowingly receive and download child pornography onto his electronic devices. Stone's electronic devices and Adobe PhotoShop software contain components manufactured outside the State of South Dakota.

ALISON J. RAMSDELL  
United States Attorney

11/18/2022

Date

HEATHER SAZAMA

Assistant United States Attorney

515 9th Street #201

Rapid City, SD 57701

Telephone: (605)342-7822

Facsimile: (605)342-1108

E-Mail: Heather.Sazama@usdoj.gov

WJS

WILLIAM JACOB STONE

Defendant

TR

TIMOTHY RENSCH

Attorney for Defendant